

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JULIA MALDONADO,)	
)	No. 14 C 6694
Plaintiff,)	Consolidated with
)	14 C 7091
)	14 C 7092
v.)	14 C 7371
)	14 C 7373
FREEDMAN ANSELMO LINDBERG LLC;)	14 C 7812
)	14 C 8173
Defendant.)	14 C 8175
)	14 C 8217
)	
)	Hon. Harry D. Leinenweber

UNOPPOSED JOINT MOTION TO REASSIGN CASES

Defendants Freedman Anselmo Lindberg, LLC ("FAL") and Portfolio Recovery Associates, LLC ("PRA"), by its counsel Hinshaw & Culbertson, LLP, pursuant to Local Rule 40.4(c) and Federal Rule of Civil Procedure 42(a)(3) hereby move to reassign cases 15-cv-01097, 15-cv-01124, and 15-cv-02538 to this Court, and in support of this Motion states as follows:

1. Plaintiff's counsel, Sulaiman Law Group, has filed dozens of identical individual Fair Debt Collection Practices Act lawsuits in the Northern District of Illinois. Consequently, they are scattered throughout numerous courtrooms, even though they involve many of the same parties and the same legal claims surrounding the same set of facts.

2. On January 20, 2015, counsel for Defendant FAL appeared before Judge Leinenweber to present its initial Motion to Reassign Cases, which sought to reassign seven (7) identical cases against Defendant FAL. (Dkt. #14).

3. On January 20, 2015, Judge Leinenweber granted Defendant FAL's motion to reassign based on relatedness and reassigned nine (9) identical cases, which included two additional cases ordered to be included in Defendant FAL's motion. (Dkt. #16).

4. Defendant PRA joins Defendant FAL and moves to reassign three lawsuits nearly identical to the instant (earliest filed) case. They are entitled:

- 1) *Martinez v. Freedman Anselmo Lindberg LLC and Portfolio Recovery Associates LLC*, 15-cv-01097 (J. Dow) (Compl. and Docket attached hereto as Ex. 1);
- 2) *Jenkins v. Portfolio Recovery Associates LLC*, 15-cv-01124 (J. Kendall) (Compl. and Docket attached hereto as Ex. 2).
- 3) *Guy v. Freedman Anselmo Lindberg LLC and Portfolio Recovery Associates LLC*, 15-cv-02538 (J. Shah) (Compl. and Docket attached hereto as Ex. 3).

5. *Martinez* alleges one count under § 1692i the Fair Debt Collection Practices Act (FDCPA) against each defendant. *Jenkins* alleges one count under § 1692i the Fair Debt Collection Practices Act (FDCPA) against Defendant Portfolio Recovery Associates. *Guy* alleges one count under § 1692i the Fair Debt Collection Practices Act (FDCPA) against each defendant.

6. The claims in both the instant case and the three cases Defendants requests be reassigned are that a collection suit was filed against the plaintiff-debtor for an unpaid credit card debt in the incorrect venue which allegedly violated § 1692i(a) of the FDCPA which provides:

(a) Venue

Any debt collector who brings any legal action on a debt against any consumer shall—

(1) in the case of an action to enforce an interest in real property securing the consumer's obligation, bring such action only in a judicial district or similar legal entity in which such real property is located; or

(2) in the case of an action not described in paragraph (1), bring such action only in the judicial district or similar legal entity—

(A) in which such consumer signed the contract sued upon; or

(B) in which such consumer resides at the commencement of the action.

15 U.S.C. § 1692i.

7. All plaintiffs and all defendants are represented by the same plaintiff and defense counsel.

8. Defendants have filed answers in all three suits.

9. The actions meet the requirements of Local Rule 40.4(c) and Fed. R. of Civ. P. 42(a)(3), and therefore, all three cases above should be reassigned to this Court.

10. Counsel for FAL and PRA have inquired with Plaintiffs' counsel in all three cases who has confirmed that Plaintiffs do not object to this request.

CONCLUSION

For the reasons stated in its initial Motion to Reassign, those discussed in open court on January 20, 2015, and pursuant to this Court's grant of Defendant FAL's previous Motion to Reassign, Defendants Freedman Anselmo Lindberg, LLC and Portfolio Recovery Associates, LLC, requests that this Court enter an order finding that the above listed cases are related within the meaning of Local Rule 40.4 and should be reassigned to this Court, and for any other relief this Court deems just and appropriate.

Respectfully submitted,

FREEDMAN ANSELMO LINDBERG LLC,
Defendant

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CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2015, I electronically filed with the Clerk of the U.S. District Court, Northern District of Illinois Eastern Division, the foregoing **Defendant's Unopposed Motion for Reassignment** by using the CM/ECF system, which will send notification of such filing(s) to all counsel of record.

s/ Lindsey A.L. Conley

Lindsey A.L. Conley